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VIA ECF

Hon. Valerie E. Caproni
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Anthony Wroten 21 Cr. 603 (VEC)

Dear Judge Caproni:

On October 28, 2021, the Court modified Mr. Wroten's bond conditions to allow him to travel to China for work, after meeting certain conditions. One of the conditions were that the mothers of his two children without passports sign letters indicating that they will not apply for a passport for their child until this case is resolved. One of those letters has since been signed and provided to the government. However, the mother of the other child has now decided against signing such a letter, unless Mr. Wroten gives up his parental rights. Since both parents are required to obtain a passport for a minor child, we request that the current bond conditions be modified to allow Mr. Wroten to sign a letter indicating that he will not help the mother of that child obtain a passport until this case is over.

I have spoken with the government, and they have no objection.

Respectfully Submitted,


Christine Delince, Esq.

cc: AUSA Finkel
AUSA Greenberg